

February 11, 2014

**BY E-MAIL TRANSMISSION  
AND REGULAR U.S. MAIL**

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USEPA Region 5  
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**BY E-MAIL TRANSMISSION  
AND REGULAR U.S. MAIL**

W. Owen Thompson  
Remedial Project Manager  
Superfund Remedial Response Section  
Seven USEPA Region 5, SR-6J  
77 W. Jackson Boulevard  
Chicago, IL 60604

**Re: Detrex Corporation Source Area (OU5) – Fields Brook  
Superfund Site, Ashtabula, Ohio**

Dear Messrs. Felitti and Thompson:

I write on behalf of the Fields Brook Action Group and its individual members, Cabot Corporation, FirstEnergy Corporation, Gencorp, Inc., Millennium Inorganic Chemicals, Ohio Power Company, Olin Corporation, Occidental Chemical Corp., Penn Lines, RTI International Metals, Inc., The Sherwin-Williams Company, Union Carbide Corporation, and CBS Operations, Inc. (collectively, “FBAG”) in connection with the Detrex Corporation Source Control Order (OU5).<sup>1</sup>

The FBAG requests that USEPA incorporate the documents, correspondence and reports enumerated on the attached list into the Administrative Record for the Detrex Source Area (OU 5). Although we believe these documents are presently within USEPA’s files, in the event that the Agency does not have any of the enumerated documents, please let me know and we will provide it with a copy of the document(s).

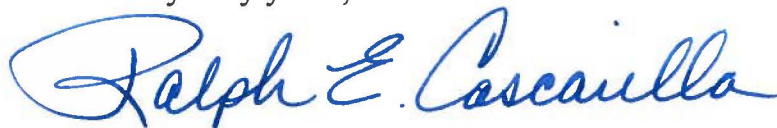
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<sup>1</sup> Although a member of the FBAG, this letter is not submitted on behalf of Detrex Corporation.

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If you have any further questions concerning this request, please do not hesitate to contact me.

Very truly yours,



Ralph E. Cascarilla  
On behalf of the FBAG

REC/rd

Enclosure

cc: Richard Mason  
Gerard Caron  
Wayne Reiber  
Joseph A. Heimbuch  
Robert W. Rule

**DETREX CORPORATION SOURCE AREA (OU5)  
FIELDS BROOK SUPERFUND SITE**

**ATTACHMENT TO FIELDS BROOK ACTION GROUP ("FBAG")  
LETTER TO USEPA DATED FEBRUARY 11, 2014**

1. "DNAPL and Groundwater Recovery Pilot Test," Woodward Clyde, September 9, 1996.
2. "Fields Brook Floodplain-DNAPL-Impacted Soils Risk Characterization," Gradient, June 6, 2001.
3. "Fields Brook Superfund Site- DNAPL Cutlines-Floodplain Wetland Areas," de maximis, inc. letter to Terese Van Donsel, June 7, 2001.
4. "State Road Bridge Maintenance Work Plan," CRA, March 2003.
5. "Contamination Source Identification and Delineation Plan," de maximis, inc., June 29, 2005.
6. "Supplemental DNAPL Source Identification and Delineation Plan," de maximis, inc, August 8, 2005.
7. "Ground Penetrating Radar Survey for Utility Location and Clay Depth," Hager Geoscience, Inc., August 8, 2005.
8. "2005 Contamination Source identification Report," Fields Brook Action Group, September 30, 2005; Submittal letter from de maximis, inc.
9. "DNAPL Presentation," de maximis, inc., October 11, 2005.
10. "Remedial Design/Remedial Action Work Plan for Resolution of DNAPL Releases," URS, Oct 21, 2005; Resulting Supplemental Investigation Report; DS Tributary Supplemental Investigation Report.
11. "DNAPL Presentation for Meeting to Discuss the Source of DNAPL Contamination in Fields Brook," de maximis, inc., February 8, 2006.
12. "Fields Brook Superfund Site – Detrex Source Control Area Remedial Design/Remedial Action Work Plan-Fields Brook Action Group Comments," de maximis, inc. letter to Terese Van Donsel, May 12, 2006.
13. "Informal Dispute Resolution Presentation," de maximis, inc., May 31, 2006.

14. "Detrex Data," e-mail to Terese Van Donsel from Robert Rule, Feb 13, 2007, and attached Technical Memorandum from Dr. B.H. Kueper, February 4, 2007.
15. "Supplemental Remedial Action Implementation Report – EU6 and EU8," de maximis, inc., March 2008, e-mail to Terese Van Donsel from Robert Rule, April 2, 2008.
16. "Conceptual Plan for Relocation and Restoration of Fields Brook," de maximis, inc., letter to Terese Van Donsel, September 15, 2008.
17. "Remedy Performance Monitoring Results," Gradient, November 25, 2008, e-mail to Terese Van Donsel from Robert Rule, December 1, 2008.
18. "Detrex DNAPL Analysis," -Memorandum to FBAG Technical Committee, Gradient, December 9, 2008.
19. "Supplement to Remedy Performance Monitoring Results," Gradient, February 4, 2009, letter to Terese Van Donsel.
20. "Review of URS Western Area Subsurface Investigation Report," Gradient, June 30, 2009, letter to Leah Evison.
21. "Comments on URS Western Area Subsurface Investigation Report, Fields Brook Superfund Site, Ashtabula, Ohio." 2p., Gradient, June 30, 2009, letter to Leah Evison.
22. "Detrex's Proposed Source Control Enhancements," Gradient, July 15, 2009, letter to Leah Evison.
23. "Assessment of the Detrex Source Control Remedy and DNAPL Migration Pathways to Fields Brook," Fields Brook Action Group, December 1, 2009.
24. Letter to Owen Thompson and incorporated comments on "Detrex / URS Sediment and DNAPL Delineation Report," de maximis, inc., September 24, 2010.
25. "DS Tributary Monitoring Results, Fields Brook Superfund Site, Ashtabula, OH." 36p., Gradient, April 9, 2011, letter report to Owen Thompson.
26. Letter to Owen Thompson and incorporated "Field Inspection and Analytical Results for the DS Tributary Sediment Sampling," from URS in response to an e-mail dated April 28, 2011 from USEPA regarding the reported re-appearance of DNAPL in the DS Tributary just west of State Road, May 24, 2011.
27. "Comments on Detrex's Source Remedy Modification and DS Tributary Excavation Work Plans," Gradient, June 27, 2011.

28. PowerPoint presentation to EPA on "Detrex Source Remedy and DS Tributary Plans," Gradient, July 28, 2011.
29. "DS Tributary Monitoring Results," Gradient, August 9, 2011, letter to Owen Thompson.
30. "FBAG Comments on URS Report Dated September 29, 2011, Field Brook Superfund Site, Ashtabula, Ohio (Draft)." 2p., Gradient, September 29, 2011.
31. "FBAG Comments on URS Report Dated October 13, 2011, Field Brook Superfund Site, Ashtabula, Ohio." 4p., Gradient, October 13, 2011.
32. "FBAG Comments on Proposed ESD for Detrex Corporation Source Area (OU5) Fields Brook Superfund Site, Ashtabula, Ohio.," Fields Brook Action Group, December 12, 2011.
33. "FBAG Comments on URS Work Plan Dated February 6, 2012, Fields Brook Superfund Site, Ashtabula, Ohio." 6p., Gradient, April 2012, letter to Peter Felitti dated April 6, 2012.
34. "May 2012 Detrex Soil Boring Investigation Fields Brook Action Group's Field Notes and Photographs." 88p., Gradient, May 1, 2012.
35. PowerPoint presentation to EPA on "Comments on Detrex Source Investigation," Gradient, July 10, 2012, letter to Peter Felitti dated July 20, 2012.
36. "FBAG Comments on URS Work Plan Dated May 24, 2012, Fields Brook Superfund Site, Ashtabula, Ohio." 3p., Gradient, May 24, 2012, letter to Peter Felitti dated July 20, 2012.
37. "FBAG Comments on URS Work Plan Dated August 25, 2012, Fields Brook Superfund Site, Ashtabula, Ohio." 5p., Gradient, September 1, 2012.
38. "Remedy Performance Monitoring Results and Comments on the Ashtabula River Area of Concern Report on PCB Source Tracking and Apportionment Final Report Fields Brook Superfund Site, Ashtabula, OH." 8p., Gradient, March 7, 2013, letter to Owen Thompson.
39. "FBAG Comments on DNAPL Recoverability Evaluation Report Dated April 12, 2013," Gradient, June 14, 2013